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8 Attorneys for Defendant  
9 ANDREW HALL

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 JEANNIE ATIENZA, individually and as  
13 successor-in-interest to Decedent  
14 LAUDEMER ARBOLEDA,

15 Plaintiff,

16 v.

17 ANDREW HALL, individually and in his  
18 capacity as a City of Danville Police  
19 Officer; and DOES 1-50 inclusive,

20 Defendants.

No. C19-03440 RS

STIPULATION AND [PROPOSED] ORDER  
RE CASE SCHEDULE AND FILING OF  
SECOND AMENDED COMPLAINT

Crtrm: 3, 17<sup>th</sup> Floor

Judge: Hon. Richard Seeborg, Presiding

Date Action Filed: June 17, 2019

Trial Date: None Assigned

23 Whereas counsel for Plaintiff Jeannie Atienza and Defendant Andrew Hall have met and  
24 conferred regarding various case management issues, including the filing of a Second Amended  
25 Complaint, selection of a Magistrate Judge for a Settlement Conference and case schedule; and

26 Whereas counsel for Plaintiff Jeannie Atienza has recently learned that Decedent Laudemer  
27 Arboleda's father, Philip Arboleda, may be alive and living in Texas, which would require adding him  
28 as a party to this litigation;

Stipulation and [Proposed] Order re Case Schedule and Filing of Second Amended Complaint –  
Case No. C19-03440 RS

1 Therefore the parties, by and through their counsel, stipulate to the following:

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1. Plaintiff Atienza shall file a Second Amended Complaint on or before November 15, 2019.
2. Defendant Hall's responsive pleading to Plaintiff's Second Amended Complaint shall be filed within 21 days of the filing of the Second Amended Complaint.
3. The parties request that the Court appoint Magistrate Judge Jacqueline Corley to conduct the Settlement Conference and that the Court set a deadline of February 28, 2020.
4. The parties anticipate the trial in this matter will take between 6 and 8 court days and request that the Court adopt this case schedule.

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Event	Proposed Dates
Last Day to Conduct Settlement Conference	February 28, 2020
Last Day to Amend Pleadings/Add Parties	February 28, 2020
Fact Discovery Cutoff	May 29, 2020
Disclosure of Expert Witnesses	June 19, 2020
Disclosure of Rebuttal Expert Witnesses	July 10, 2020
Expert Witness Discovery Cutoff	July 31, 2020
Last Day for Dispositive Motion Hearing	August 21, 2020
Pretrial Conference	October 28, 2020
Trial Date	November 9, 2020

5. The parties request that the Court schedule a further case management conference at 10:00 a.m. on March 12, 2020.

Dated: October 31, 2019

/s/ *Adante D. Pointer*

ADANTE D. POINTER  
Law Offices of John L. Burris  
Attorneys for Plaintiff Jeannie Atienza

1 DATED: October 31, 2019

SHARON L. ANDERSON  
COUNTY COUNSEL

4 By: /s/ D. Cameron Baker

5 D. CAMERON BAKER  
6 Deputy County Counsel  
7 Attorneys for Defendant  
8 Andrew Hall

9 ATTORNEY ATTESTATION

10 I hereby attest that I have authorization from all of the above-named counsel to E-file this  
11 stipulation and this authority is reflected by the conformed signature (“/s/”) within this E-filed  
12 document.

13 DATE: October 31, 2019

/s/ D. Cameron Baker

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15 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

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17 Dated: \_\_\_\_\_, 2019

18 By:

19 Hon. Richard Seeborg  
20 United States District Judge